

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

## VIA ELECTRONIC TRANSMISSION

Mr. Robert Crosby, Manager Reynoldsville Sewage Authority 400 N 5<sup>th</sup> Street Reynoldsville, Pennsylvania 15851-1342 water100@verizon.net

Re: Clean Water Act Section 308 Information Requirement

Dear Mr. Crosby:

This letter concerns an Information Requirement Letter, dated December 18, 2019, sent to Reynoldsville Sewage Authority ("Reynoldsville SA") by the U.S. Environmental Protection Agency, Region III ("EPA") that required, among other things, that Reynoldsville SA personnel provide detailed information regarding the acceptance of oil and gas wastewater. EPA has reviewed the response provided by Reynoldsville SA.

Based on the information provided by Reynoldsville SA in the response, it is understood that Reynoldsville SA was using a field screening Standard Operating Procedure ("SOP") for brine acceptance prior to September 5, 2019. On September 5, 2019, Reynoldsville SA stopped accepting all wastes from oil and gas operations, both conventional and unconventional. Should Reynoldsville SA begin accepting oil and gas waste again in the future, it is recommended that the SOP be updated to ensure that Reynoldsville SA screens all industrial user applicants to determine if they fall into the stripper subcategory in addition to the field screening procedures previously in use.

This letter is not a compliance determination of Reynoldsville SA's wastewater program. Based on the information currently available, EPA does not plan to pursue any further actions associated with this Information Requirement Letter at this time. Please note, however, that any noncompliance with an NPDES permit or the Clean Water Act (CWA) could result in the initiation of further review and action pursuant to the Federal enforcement provisions set forth in Section 309 of the CWA, 33 U.S.C. Section 1319. Reynoldsville SA is therefore encouraged to pay close attention to all permit conditions and reporting requirements.

Thank you for your cooperation in this matter. If you have any questions, please contact Jennie Brancho of my staff at 215-814-2087.

Sincerely,

Stacie Pratt, Chief NPDES Section, Water Branch Enforcement & Compliance Assurance Division

## Enclosure

cc: Jennie Brancho, EPA (<u>brancho.jennie@epa.gov</u>) Sean Furjanic, PADEP (<u>sefurjanic@pa.gov</u>) John Holden, PADEP (<u>johholden@pa.gov</u>)